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(Additional counsel appear on signature page)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle Kingsbury
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF ERIC L. CRAMER,
ESQ.**

DECLARATION OF ERIC L. CRAMER, ESQ.

1 I, Eric L. Cramer, Esq., declare and state as follows:

2 1. I am a managing shareholder of Berger Montague PC, one of the Court appointed
3 Interim Co-Lead Counsel for the proposed Classes and an attorney for Individual and
4 Representative Plaintiffs. I am a member in good standing of the State Bars of Pennsylvania and
5 New York, and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have
6 personal knowledge of the facts stated in this declaration. If called as a witness, I could and would
7 testify competently to them.

8 2. I make this declaration in support of the Parties' Joint Agreed Motion to Extend
9 Motion for Summary Judgment Opposition and Reply Brief Deadlines and for Leave to File
10 Summary Judgment Briefing Materials in Excess of Page Limits Imposed by Local Rule 7-3.

11 3. On July 23, 2018 and July 25, 2018, Plaintiffs' Counsel met and conferred with
12 counsel for Zuffa, and the parties agreed to seek leave from this Court to extend the page limits
13 for upcoming Summary Judgment briefing.

14 4. On July 27, 2018, the parties jointly moved this Court to permit the parties to
15 allocate 40 pages for Zuffa's Motion for Summary Judgment, 40 pages for Plaintiffs' Opposition
16 to Zuffa's Motion for Summary Judgment, and 21 pages for Zuffa's Reply in Support of its
17 Motion for Summary Judgment. *See* ECF No. 570.

18 5. On July 30, 2018, Zuffa filed its Motion for Summary Judgment. *See* ECF No.
19 573. Excluding exhibits and indexes, Zuffa's Motion for Summary Judgment totaled 40 pages.

20 6. On August 24, 2018 and August 25, 2018, Plaintiffs' Counsel met and conferred
21 with counsel for Zuffa, and the parties agreed to seek leave from this Court for (1) an additional
22 extension of the page limits for Plaintiffs' Opposition to Zuffa's Motion for Summary Judgment
23 and Zuffa's Reply in Support of its Motion for Summary Judgment, and (2) a one-week extension
24 of the deadlines set forth for these filings in the Second Stipulated Discovery Plan and Scheduling
25 Order, ECF No. 513, entered by this Court on January 10, 2018.

26 7. The parties seek leave from the Court to permit the parties to allocate 40 pages for
27 Zuffa's Motion for Summary Judgment, 45 pages for Plaintiffs' Opposition to Zuffa's Motion for
28

1 Summary Judgment, and 27 pages for Zuffa's Reply in Support of its Motion for Summary
2 Judgment.

3 8. In addition, the parties request that the Court extend the current deadlines set forth
4 in the Second Stipulated Discovery Plan and Scheduling Order, ECF No. 513, by one week for
5 Plaintiffs' Opposition to Zuffa's Motion for Summary Judgment and Zuffa's Reply in Support of
6 its Motion for Summary Judgment. This proposed extension would alter the deadline for
7 Plaintiffs' Opposition to Zuffa's Motion for Summary Judgment from September 14, 2018 to
8 September 21, 2018 and for Zuffa's Reply in Support of its Motion for Summary Judgment from
9 October 26, 2018 to November 2, 2018.

10 9. The above-captioned matter was filed in December 2014. The operative complaint
11 contains nearly 60 pages of allegations.

12 10. Since the case was filed, the parties have engaged in extensive fact and expert
13 discovery, including several million documents, more than 50 depositions, and more than 900
14 pages of expert reports.

15 11. Due to the extensive nature of discovery and the fact that the issues to be
16 addressed in the Summary Judgment briefing are substantial and susceptible of lengthy
17 exposition, the parties seek leave from the Court to extend the page limits in order to ensure that
18 all material issues can be adequately addressed.

19 12. The parties agree that additional time to file these briefs is necessary in order to
20 adequately address the breadth of the issues involved.

21
22 I declare under penalty of perjury and the laws of the United States that the foregoing is
23 true and correct. This declaration was executed in Philadelphia, Pennsylvania on August 28,
24 2018.

25
26 /s/ Eric L. Cramer

27 Eric L. Cramer
28